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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CIVIL CASE NO. 20-02013 VC
	)	[Filed March 23, 2020]
Plaintiff,	)	
	)	
v.	)	NOTICE OF RELATED CASE
	)	IN A CRIMINAL ACTION
ONE PARCEL OF REAL ESTATE	)	
PROPERTY LOCATED AT 9414 PLAZA	)	
POINT DRIVE, MISSOURI CITY, TEXAS,	)	
77459,	)	
	)	
Defendant.	)	

UNITED STATES OF AMERICA,	)	Case No. 20-CR-00249 RS
	)	[Filed June 22, 2020]
Plaintiff,	)	
	)	
v.	)	
	)	
ROWLAND MARCUS ANDRADE.	)	
	)	
Defendant.	)	

[CAPTION CONTINUES NEXT PAGE]

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2	UNITED STATES OF AMERICA,	) Case No. CR 20-0260 CRB
3	Plaintiff,	) [Filed June 25, 2020]
4	v.	)
5	JACK ABRAMOFF,	)
6	Defendant.	)
7		)

8 The United States, pursuant to Local Criminal Rule 8-1, hereby notifies the Court that the two  
9 above-captioned criminal cases are related, and that these two criminal cases may be related to a  
10 pending civil case in this District.

11 The first-filed case, *United States of America v. One Parcel of Real Estate Property Located at*  
12 *9414 Plaza Point Drive, Missouri City, Texas, 77459*, Case No. 20-CV-02013 VC, was filed on March  
13 23, 2020. In that civil forfeiture action, the United States alleges that the defendant property named in  
14 the above caption is subject to forfeiture under Title 18, United States Code, Sections 981(a)(1)(A) and  
15 (a)(1)(C). The complaint alleges that the defendant property was purchased using the proceeds of funds  
16 derived from a wire fraud scheme and money laundering transactions in which Rowland Marcus  
17 Andrade was involved.

18 A criminal indictment, *United States v. Rowland Marcus Andrade.*, Case No. 20-CR-00249 RS,  
19 was filed on June 22, 2020 and unsealed on June 25, 2020. The indictment charges Rowland Marcus  
20 Andrade with one count of wire fraud, 18 U.S.C. § 1343, and one count of money laundering, 18 U.S.C.  
21 § 1956(a)(1), alleging that Andrade engaged in scheme to defraud related to the sale of a purported new  
22 cryptocurrency called AML Bitcoin. The indictment also includes a criminal forfeiture allegation, under  
23 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), seeking forfeiture, upon conviction, of the same  
24 property at issue in the civil forfeiture action.

25 A criminal information, *United States v. Jack Abramoff*, Case No. CR 20-0260 CRB, was filed  
26 on June 25, 2020. That information charges Jack Abramoff with one count of conspiracy to commit an  
27 offense against the United States, namely wire fraud, in violation of 18 U.S.C. § 371. The information  
28 names as a co-conspirator Marcus Andrade, and alleges a conspiracy to make false statements regarding

1 the cryptocurrency AML Bitcoin. The information also alleges that Abramoff violated the registration  
2 requirement of the Lobbying Disclosure Act by failing to register as a lobbyist after being retained to  
3 have a lobbying contact or having a lobbying contact.

4 The allegations in the civil forfeiture action, the indictment, and the information, each involve  
5 the activities of Andrade and his company, NAC Foundation, LLC, in connection with the sale of AML  
6 Bitcoin, and the cases involve the same period of alleged criminal conduct by Andrade, 2017 and 2018.  
7 The allegations in the cases therefore relate to the same events, occurrences, transactions, and property,  
8 and each action involve similar allegations. Because of the facts and allegations common to each action,  
9 the actions may entail substantial duplication of labor if heard by different judges. For these reasons,  
10 pursuant to Local Rule 8-1(c)(4), the government believes that assignment to a single judge is likely to  
11 conserve judicial resources and promote an efficient determination of the action.

12 DATED: June 25, 2020

Respectfully submitted,

13 DAVID L. ANDERSON  
14 United States Attorney

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16 /s/  
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18 CHRIS KALTSAS  
19 Assistant United States Attorneys  
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